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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JORGE ABRAMOVS,

Defendant.

2:21-CR-027-RFB-DJA

**United States of America's Motion to
Approve Listing Price for Real Property
Located at 3726 South Las Vegas
Boulevard, Unit 509, Las Vegas, Nevada**

Motion and Memorandum of Points and Authorities

The United States of America (United States) moves this Court to approve a listing sale price of \$325,000 for Real Property Located at 3726 South Las Vegas Boulevard, Unit 509, Las Vegas, Clark County, (Unit 509):

MORE PARTICULARLY DESCRIBED AS:

PARCEL 1:

UNIT 509 IN BUILDING WEST IN VEER TOWERS, AS SHOWN ON THAT CERTAIN FINAL MAP OF THE VEER TOWERS, A RESORT CONDOMINIUM SUBDIVISION ON FILE IN BOOK 142 OF PLATS, PAGE 42 AND AS SET FORTH IN THE DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS AND RESERVATION OF EASEMENTS FOR VEER TOWERS RECORDED MAY 03, 2010 IN BOOK 20100503 AS INSTRUMENT NO. 0002036, BOTH IN THE OFFICE OF THE COUNTY RECORDER, CLARK COUNTY, NEVADA.

PARCEL 2:

AN ALLOCATED INTEREST AS A TENANT-IN-COMMON IN THE COMMON ELEMENTS OF VEER TOWERS (INCLUDING ANY

ANNEXATIONS THERETO), AS SHOWN BY THE MAP AND AS SET FORTH IN THE DECLARTION.

PARCEL 3:

AN EXCLUSIVE EASEMENT APPURTENANT TO PARCELS 1 AND 2 DESCRIBED ABOVE, OVER AREAS DEFINED AND DESCRIBED AS LIMITED COMMON ELEMENTS, IF ANY, ALLOCATED TO PARCELS 1 AND 2 IN THE DECLARATION AND AS SHOWN AND DELINEATED UPON THE MAP REFFERED TO ABOVE.

PARCEL 4:

NON-EXCLUSIVE EASEMENTS FOR ACCESS, INGRESS, EGRESS, USE AND OTHER PURPOSES ALL DESCRIBED IN THE DECLARATION AND IN THAT CERTAIN (A) DECLARATION OF CENTRAL PLANT EASEMENTS, DATED DECEMBER 01, 2009 AND RECORDED DECEMBER 01, 2009 IN BOOK 20091201 AS INSTRUMENT NO. 0002884 OF OFFICIAL RECORDS, AND AS AMENDED BY THAT CERTAIN FIRST AMENDMENT TO DECLARATION OF CENTRAL PLANT EASEMENTS, DATED JANUARY 07, 2010 AND RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO. 0000577 OF OFFICIAL RECORDS; (B) PARKING AND ACCESS AGREEMENT, DATED APRIL 28, 2010 AND RECORDED MAY 03, 2010 IN BOOK 20100503 AS INSTRUMENT NO. 0000515 OF OFFICIAL RECORDS; (C) DECLARATION OF SUPPORT AND ENCROACHMENT EASEMENTS, DATED DECEMBER 01, 2009 AND RECORDED DECEMBER 01, 2009 IN BOOK 20091201 AS INSTRUMENT NO. 0002885 OF OFFICIAL RECORDS, AND AS AMENDED BY THAT CERTAIN FIRST AMENDMENT TO DECLARATION OF SUPPORT AND ENCROACHMENT EASEMENTS, DATED JANUARY 07, 2010 AND RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO. 0000578 OF OFFICIAL RECORDS; AND (D) DECLARATION OF LIFE SAFETY SYSTEMS EASEMENTS, DATED DECEMBER 01, 2009 AND RECORDED DECEMBER 01, 2009 IN BOOK 20091201 AS INSTRUMENT NO. 0002886 OF OFFICIAL RECORDS, AND AS AMENDED BY THAT CERTAIN FIRST AMENDMENT TO DECLARATION OF LIFE SAFETY SYSTEM EASEMENTS DATED JANUARY 07, 2010 AND RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO. 0000579 OF OFFICIAL RECORDS, AND ALL IMPROVEMENTS AND APPURTENANCES THEREON, APN: 162-20-714-020.

On November 12, 2021, this Court authorized the Interlocutory Sale of Unit 509. Order Approving Interlocutory Sale, ECF No. 56. The Interlocutory Sale was not opposed by Defendant. ECF No. 56. Following the Court's Order, Douglas Sawyer (the Court-approved broker) appraised the property and, based on recent sales, adjustments to the recent sales to account for differences between the property and comparable properties, the condition of the property, and the prevailing real estate market, opined that the property

1 was worth between \$320,000 and \$325,000. Mr. Sawyer has recommended a listing price of
2 \$325,000.¹

3 The United States recommends that this Court approve the recommended listing
4 price of \$325,000. The United States views this listing price as fair and reasonable based on
5 the information received from Douglas Sawyer and the most recent comparable sales.

6 Respectfully submitted this 13th day of April 2022.

7 CHRISTOPHER CHIOU
8 Acting United States Attorney

9 /s/ James A. Blum
10 JAMES A. BLUM
11 Assistant United States Attorney

12 IT IS SO ORDERED:

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14 RICHARD F. BOULWARE, II
15 UNITED STATES DISTRICT JUDGE

16 DATED: April 29, 2022

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28 ¹ On April 12, 2022, the Defendant agreed to the sale price of \$325,000 through his counsel, Maggie Lambrose.